

EXHIBIT 4

1 Q Have you listened to any tapes of conversations
2 between you and Terry Snyder?

3 A No.

4 Q Like I said, I'd like to play you a portion of a
5 tape. And then we can talk about it. If you need me at any
6 time to stop it or can't hear or something. I mean you'll
7 listen to the tape and then let me know your thoughts.
8 Okay?

9 (The tape was played for the witness.)

10 Q Do you need me to rewind or anything? Would you
11 like me to?

12 A Some of it I couldn't understand. I understand I
13 apologized for something, which I told you that earlier in
14 the statement.

15 Q Just some preliminaries. Do you recognize the
16 voices on the tapes?

17 A Yes. It's Terry's voice and it sounds like mine in
18 the background.

19 Q Do you recall that conversation?

20 A Yes, vaguely. I don't know when it was. But, yeah,
21 vaguely.

22 Q Do you know approximately when it was?

23 A No.

24 Q Was it during the month of her termination?



1 A I wouldn't know. I wouldn't even know.

2 Q Do you recall laughing during this conversation?

3 A Well, probably. Not laughing but probably smiling
4 like what are you talking about, you know.

5 Q Did you deny saying to Terry that you should wear a
6 dress with no panties?

7 A Repeat that.

8 Q Did you deny saying to Terry that she should wear a
9 dress with no panties?

10 A Yes, I denied that.

11 Q Did you deny it that day?

12 A I asked her what was she talking about, I believe.

13 Q Did you tell her you didn't say that?

14 A I don't know what I said. I just asked her what are
15 you talking about.

16 Q Did you apologize to Terry Snyder?

17 A If she said I was being rude to her, I probably
18 said, hey, you know, I apologize for yelling at you or
19 whatever. I mean that's what was on the tape. She said I
20 was yelling at her.

21 Q Do you recall her saying that she didn't mind the
22 yelling, that it was your job to yell?

23 A No, I don't remember that.

24 Q You didn't hear that part?

